

# Exhibit 1

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**ORDER APPROVING STIPULATION STAYING ADVERSARY PROCEEDING**

Upon the *Certification of Counsel* and *Stipulation Staying Adversary Proceeding* (the “Stipulation”) entered into between Plaintiffs FTX Trading Ltd. and Maclaurin Investments Ltd.; and Lorem Ipsum UG, Patrick Gruhn, Robin Matzke, and Brandon Williams, a copy of which is attached hereto as **Exhibit A**; and the Court having jurisdiction to consider approval of the Stipulation; and it appearing that sufficient notice of the Stipulation has been given; and after due deliberation; and good sufficient cause appearing therefore;

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

IT IS HEREBY ORDERED THAT:

1. The Stipulation is hereby APPROVED.
2. The terms and provisions of the Stipulation shall immediately be effective and enforceable upon entry of this Order.
3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

# Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

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Debtors.

Chapter 11

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FTX TRADING LTD. and MACLAURIN  
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LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**STIPULATION STAYING ADVERSARY PROCEEDING**

This stipulation (the “Stipulation”) is made and entered into in the above-captioned adversary proceeding (the “Adversary Proceeding”) by and among FTX Trading Ltd. and Maclaurin Investments Ltd. (collectively, “Plaintiffs”); and defendants, Lorem Ipsum UG, Patrick Gruhn, Robin Matzke (collectively, the “LI Defendants”), and Brandon Williams (“Defendant Williams” and together with the LI Defendants, “Defendants”), by and through their respective undersigned counsel. In support of the Stipulation, the Parties respectfully state as follows:

WHEREAS, on July 12, 2023, the Plaintiffs commenced the Adversary Proceeding by filing a complaint against Defendants [Adv. D.I. 1];

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

WHEREAS, on August 22, 2023, Plaintiffs and Defendants submitted a proposed case management plan and scheduling order [Adv. D.I. 8] setting forth a schedule for the Adversary Proceeding, which the Court entered on August 23, 2023 [Adv. D.I. 9] (the “Scheduling Order”);

WHEREAS, on October 25, 2023, Defendant Williams filed the *Motion to Dismiss or for Summary Judgment* [Adv. D.I. 23];

WHEREAS, on October 27, 2023, the LI Defendants filed the *Motion to Dismiss Complaint by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG* and brief in support thereof [Adv. D.I. 31 & 32];

WHEREAS, on November 3, 2023, Defendant Williams filed the *Motion to Dismiss for Lack of Subject Matter Jurisdiction* [Adv. D.I. 34];

WHEREAS, on November 30, 2023, the Court entered an order [Adv. D.I. 51] permitting intervention by the Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases (the “Committee,” together with Plaintiffs and Defendants, the “Parties”);

WHEREAS, on December 15, 2023, the Plaintiffs filed the *Plaintiffs’ Omnibus Memorandum of Law in Opposition to Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG’s Motion to Dismiss and Defendant Brandon Williams’s Motion to Dismiss or for Summary Judgment* [Adv. D.I. 58]. The Committee also filed *Plaintiff-Intervenor the Official Committee of Unsecured Creditors’ Joinder to Plaintiffs’ Omnibus Memorandum of Law in Opposition to Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG’s Motion to Dismiss and Defendant Brandon Williams’s Motion to Dismiss or for Summary Judgment* [Adv. D.I. 63];

WHEREAS, on January 3, 2024, the Court entered the Amended Case Management Plan and Scheduling Order [Adv. D.I. 68], amending the Scheduling Order (the “Amended Scheduling Order”); and

WHEREAS, the Parties have reached an agreement in principle resolving this Adversary Proceeding and are actively working to document such resolution.

**NOW, THEREFORE**, it is hereby stipulated and agreed, and upon approval by the Court it shall be **SO ORDERED**:

1. The Parties agree to a stay and abeyance of all deadlines in this Adversary Proceeding, including those set forth in the Amended Scheduling Order [Adv. D.I. 68], until such time as a revised schedule is agreed to by the Parties or further ordered by the Court.

2. Pending approval of this Stipulation by the Court, each of the Parties agrees that it is and will be bound by this Stipulation and waives any right to object to approval by the Court. In the event that this Stipulation is not approved by the Court, it will be null and void and have no force or effect whatsoever except as may be otherwise agreed in writing by the Parties. In such event, the Parties agree to confer in good faith to amend the briefing and discovery deadlines in the Amended Scheduling Order.

3. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation and the order approving it.

*[Remainder of page intentionally left blank]*

Dated: January 31, 2024  
Wilmington, Delaware

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